

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CHINA AI CAPITAL LIMITED, a British Virgin Islands limited company, derivatively on behalf of LINK MOTION INC., a Cayman Islands limited company f/k/a NQ MOBILE INC.,

Plaintiff,

-against-

DLA PIPER LLP (US), a Maryland limited liability partnership, and CARYN G. SCHECHTMAN, a natural person,

Defendants,

-and-

LINK MOTION INC., a Cayman Islands limited company f/k/a NQ MOBILE INC.

Nominal Defendant.

Case No. 1:21-cv-10911 (VM)

**STIPULATION AND [PROPOSED] ORDER AND
BRIEFING SCHEDULE ON SANCTIONS AMOUNT**

WHEREAS, on March 6, 2024, the Court issued an order (Dkt. 65) overruling Plaintiff's objections to the Report & Recommendation issued by Magistrate Judge Valerie Figueredo on July 28, 2023, and directing the parties to submit within 14 days a proposed briefing schedule with respect to the costs and attorneys' fees incurred by Defendants in defending this action;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the Parties, through their undersigned counsel and subject to the approval of the Court, that:

1. Defendants' opening motion for costs and attorney's fees incurred in defending this action shall be due on March 29, 2024;
2. Plaintiff's opposition to Defendants' motion shall be due on May 1, 2024;

3. Defendants' reply shall be due on May 13, 2024.

AND IT IS FURTHER STIPULATED AND AGREED that a facsimile copy of this Stipulation shall have the full force and effect of an original for all purposes.

Dated: New York, New York
March 19, 2024

FELICELLO LAW P.C.



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*Attorney for Defendants DLA Piper LLP (US)
and Caryn G. Schechtman*